

ALSTON HUNT FLOYD & ING
PAUL ALSTON 1126
JASON H. KIM 7128
1001 Bishop Street, Suite 1800
Honolulu, Hawai'i 96813
Telephone: (808) 524-1800
Facsimile: (808) 524-4591
E-mail: palston@ahfi.com
jkim@ahfi.com

HAWAII DISABILITY RIGHTS CENTER
JOHN P. DELLERA 6602
MATTHEW C. BASSETT 6443
ROY BENAVIDEZ 7907
1132 Bishop Street, Suite 2102
Honolulu, Hawai'i 96813
Telephone: (808) 949-2922
Facsimile: (808) 949-2928
E-mail: john@hawaiidisabilityrights.org
mattbassettesq@gmail.com
rbenavidez@hawaiidisabilityrights.org

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

R.P.-K., through his parent C.K.,
R.T.D., through his parents R.D. and
M.D., and the HAWAII DISABILITY
RIGHTS CENTER, in a representative
capacity on behalf of its clients and all
others similarly situated,

Plaintiffs,

vs.

DEPARTMENT OF EDUCATION,
State of Hawai'i,

Defendant.

CIVIL NO. 10-00436 DAE-KSC
(Class Action)

**PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION;
MEMORANDUM IN SUPPORT OF
MOTION; APPENDICES 1-2;
DECLARATION OF JOHN P.
DELLERA, EXHIBITS A-H;
DECLARATION OF J.K.,
EXHIBITS I-J; DECLARATION OF
N.W., EXHIBITS K-L;
DECLARATION OF A.K.,
EXHIBITS M-N, DECLARATION
OF B.C., EXHIBITS O-P;**

**DECLARATION OF S.T.,
EXHIBITS Q-R; DECLARATION
OF L.D., EXHIBITS S-T;
DECLARATION OF ROY M.
BENAVIDEZ, EXHIBIT U;
CERTIFICATE OF SERVICE**

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PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs, through their undersigned attorneys, hereby move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a preliminary injunction requiring the DOE to continue to provide educational and related services until the conclusion of this action to K.K., M.W., A.C.K., K.C., A.D., and **M.L. and to all other members of the Plaintiff class who have qualified for Extended School Year services.**

This motion is based upon the attached memorandum, declarations, and exhibits and upon such further evidence and argument as may be presented prior to or during a hearing on this motion.

DATED: Honolulu, Hawai‘i, June 23, 2011.

/s/ John P. Dellera
JOHN P. DELLERA
MATTHEW C. BASSETT
ROY BENAVIDEZ
PAUL ALSTON
JASON H. KIM

Attorneys for Plaintiffs